

FILED 15 MAY 3 9:07AM DDC-DRH

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

UNITED STATES OF AMERICA,

1:15-CR- 00175-MC

Plaintiff,

INDICTMENT

v.

18 U.S.C. § 2

LEON RAMON IRELAND,
JON ANDREW MEYER,
VICTORIA INDIA KOHOUT,

18 U.S.C. § 371

18 U.S.C. § 922(a)(6)

UNDER SEAL

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

CONSPIRACY TO FALSIFY FIREARMS APPLICATION

On or about April 2011 to April 2013, in the District of Oregon, the defendants, LEON RAMON IRELAND, JON ANDREW MEYER, and VICTORIA INDIA KOHOUT, did unlawfully and knowingly conspire and agree with each other to commit the following offense: in connection with the acquisition of firearms from a licensed dealer, to knowingly and intentionally make a false oral or written statement intended or likely to deceive the dealer, as to a fact material to the lawfulness of such acquisition of the firearms, to wit: falsely representing the identity of the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 371 and 922(a)(6). The grand jury further alleges overt acts as described in Counts 2 through 10 below.

COUNT 2

FALSE STATEMENT ON FIREARMS APPLICATION

On or about June 9, 2012, in the District of Oregon, the defendants, JON ANDREW MEYER and LEON RAMON IRELAND, in connection with the acquisition of a firearm, including:

Smith & Wesson SW9VE 9mm semi-automatic pistol, # DYK2939
Smith & Wesson SW9VE 9mm semi-automatic pistol, # DYK2807
Smith & Wesson SW9VE 9mm semi-automatic pistol, # DYK2928

from Tyrholm Big R, Inc., a licensed federal firearms dealer in White City, Oregon, did knowingly and intentionally make a false oral or written statement intended or likely to deceive the dealer, as to a fact material to the lawfulness of such acquisition of the said firearm, in that JON ANDREW MEYER represented that he resided at 420 Fish Hatchery Road, Grants Pass, Oregon, when in fact he did not reside there, and that he was the actual buyer of the firearms when in fact he was acquiring the firearms on behalf of another person, LEON RAMON IRELAND, in violation of 18 U.S.C. § 922(a)(6) and § 2.

COUNT 3

FALSE STATEMENT ON FIREARMS APPLICATION

On or about July 2, 2012, in the District of Oregon, the defendants JON ANDREW MEYER and LEON RAMON IRELAND, in connection with the acquisition of a firearm, including:

Glock 19, 9mm semi-automatic pistol, #TBW317
Glock 21, .45 caliber semi-automatic pistol, #GPM064
Glock 26, 9mm semi-automatic pistol, #TDG000
Glock 21, .45 caliber pistol, #SDG245 (recovered San Francisco, CA 3/29/14)
Glock 19, 9mm pistol, #HAW283 (recovered Oakland, CA 8/15/13)

from Cash Connection, a licensed federal firearms dealer in Grants Pass, Oregon, did knowingly and intentionally make a false oral or written statement intended or likely to deceive the dealer,

as to a fact material to the lawfulness of such acquisition of the said firearm, in that JON ANDREW MEYER represented that he resided at 420 Fish Hatchery Road, Grants Pass, Oregon, when in fact he did not reside there, and that he was the actual buyer of the firearms when in fact he was acquiring the firearms on behalf of another person, LEON RAMON IRELAND, in violation of 18 U.S.C. § 922(a)(6) and § 2.

COUNT 4

FALSE STATEMENT ON FIREARMS APPLICATION

On or about July 6, 2012, in the District of Oregon, the defendants, JON ANDREW MEYER and LEON RAMON IRELAND, in connection with the acquisition of a firearm, including:

Smith & Wesson 9mm pistol, #DYK4335
Smith & Wesson .40 caliber pistol, #DYK6567

from Tyrholm Big R, Inc., a licensed federal firearms dealer in White, Oregon, did knowingly and intentionally make a false oral or written statement intended or likely to deceive the dealer, as to a fact material to the lawfulness of such acquisition of the said firearm, in that JON ANDREW MEYER represented that he resided at 420 Fish Hatchery Road, Grants Pass, Oregon, when in fact he did not reside there, and that he was the actual buyer of the firearms when in fact he was acquiring the firearms on behalf of another person, LEON RAMON IRELAND, in violation of 18 U.S.C. § 922(a)(6) and § 2.

COUNT 5

FALSE STATEMENT ON FIREARMS APPLICATION

On or about July 7, 2012, in the District of Oregon, the defendants, VICTORIA INDIA KOHOUT, JON ANDREW MEYER, and LEON RAMON IRELAND, in connection with the acquisition of a firearm, including:

Smith & Wesson SW9VE, 9mm pistol, #DYK4320 (recovered Ontario, CA 9/15/13)
Smith & Wesson SW9VE, 9mm semi-automatic pistol, #DYK4391
Smith & Wesson SW40VE, .40 cal pistol, #DYK6554 (recovered Oakland, 04/24/13).

from Tyrholm Big R, Inc., a licensed federal firearms dealer in White, Oregon, did knowingly and intentionally make a false oral or written statement intended or likely to deceive the dealer, as to a fact material to the lawfulness of such acquisition of the said firearm, in that VICTORIA INDIA KOHOUT represented that she was the actual buyer of the firearms when in fact she was acquiring the firearms on behalf of another person, JON ANDREW MEYER and/or LEON RAMON IRELAND, in violation of 18 U.S.C. § 922(a)(6) and § 2.

COUNT 6

FALSE STATEMENT ON FIREARMS APPLICATION

On or about October 2, 2012, in the District of Oregon, the defendants JON ANDREW MEYER and LEON RAMON IRELAND, in connection with the acquisition of a firearm, including:

Glock 26, 9mm pistol, #RFU709
Glock 21, .45-caliber pistol, #RTK489

from Cash Connection, a licensed federal firearms dealer in Grants Pass, Oregon, did knowingly and intentionally make a false oral or written statement intended or likely to deceive the dealer, as to a fact material to the lawfulness of such acquisition of the said firearm, in that JON ANDREW MEYER represented that he resided at 420 Fish Hatchery Road, Grants Pass, Oregon, when in fact he did not reside there, and that he was the actual buyer of the firearms when in fact he was acquiring the firearms on behalf of another person, LEON RAMON IRELAND, in violation of 18 U.S.C. § 922(a)(6) and § 2.

COUNT 7

FALSE STATEMENT ON FIREARMS APPLICATION

On or about October 2, 2012, in the District of Oregon, the defendants JON ANDREW MEYER and LEON RAMON IRELAND, in connection with the acquisition of a firearm, including:

Glock 26, 9mm pistol, #CCB483

Glock 22, .40-caliber pistol, #SHG880 (recovered Hayward, CA 10/22/12)

from Fox Firearms, a licensed federal firearms dealer in Grants Pass, Oregon, did knowingly and intentionally make a false oral or written statement intended or likely to deceive the dealer, as to a fact material to the lawfulness of such acquisition of the said firearm, in that JON ANDREW MEYER represented that he resided at 420 Fish Hatchery Road, Grants Pass, Oregon, when in fact he did not reside there, and that he was the actual buyer of the firearms when in fact he was acquiring the firearms on behalf of another person, LEON RAMON IRELAND, in violation of 18 U.S.C. § 922(a)(6) and § 2.

COUNT 8

FALSE STATEMENT ON FIREARMS APPLICATION

On or about November 3, 2012, in the District of Oregon, the defendants JON ANDREW MEYER and LEON RAMON IRELAND, in connection with the acquisition of a firearm, including:

Glock 19, 9mm pistol, #SYM437

Glock 19, 9mm pistol, #SYM435 (recovered Alameda, CA 08/11/2013)

Glock 26, 9mm pistol, # SZU445

from Fox Firearms, a licensed federal firearms dealer in Grants Pass, Oregon, did knowingly and intentionally make a false oral or written statement intended or likely to deceive the dealer, as to a fact material to the lawfulness of such acquisition of the said firearm, in that JON ANDREW

MEYER represented that he resided at 420 Fish Hatchery Road, Grants Pass, Oregon, when in fact he did not reside there, and that he was the actual buyer of the firearms when in fact he was acquiring the firearms on behalf of another person, LEON RAMON IRELAND, in violation of 18 U.S.C. § 922(a)(6) and § 2.

COUNT 9

FALSE STATEMENT ON FIREARMS APPLICATION

On or about November 3, 2012, in the District of Oregon, the defendants VICTORIA INDIA KOHOUT, JON ANDREW MEYER, and LEON RAMON IRELAND, in connection with the acquisition of a firearm, including:

Glock 30, .45-caliber pistol, #FLS536
Glock 23, 40-caliber pistol, #SWW181

from Cash Connection, a licensed federal firearms dealer in Grants Pass, Oregon, did knowingly and intentionally make a false oral or written statement intended or likely to deceive the dealer, as to a fact material to the lawfulness of such acquisition of the said firearm, in that VICTORIA INDIA KOHOUTS represented that she was the actual buyer of the firearms when in fact she was acquiring the firearms on behalf of another person, JON ANDREW MEYER and/or LEON RAMON IRELAND, in violation of 18 U.S.C. § 922(a)(6) and § 2.

COUNT 10

FALSE STATEMENT ON FIREARMS APPLICATION

On or about April 10, 2013, in the District of Oregon, the defendants JON ANDREW MEYER and LEON RAMON IRELAND, in connection with the acquisition of a firearm, including:

Glock 19, 9mm pistol, #UNE639
Glock 35, .40 caliber pistol, #UGB799

from Good Guys Guns, a licensed federal firearms dealer in Medford, Oregon, did knowingly and intentionally make a false oral or written statement intended or likely to deceive the dealer, as to a fact material to the lawfulness of such acquisition of the said firearm, in that JON ANDREW MEYER represented that he resided at 420 Fish Hatchery Road, Grants Pass, Oregon, when in fact he did not reside there, and that he was the actual buyer of the firearms when in fact he was acquiring the firearms on behalf of another person, LEON RAMON IRELAND, in violation of 18 U.S.C. § 922(a)(6) and § 2.

Dated this 7th day of May, 2015.

PRESENTED BY:

S. AMANDA MARSHALL, OSB #953473
United States Attorney


DOUGLAS W. FONG, OSB #842195
Assistant U.S. Attorney